



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

Inspection Date 01/20/2010Time Start 1150 hrsTime Finish 1500 hrs

*Bill [signature]*

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOReFACTS ID# 1857032Company name B. Braun Medical, Inc. *JAN 25 2010*EPA I.D. Number PAD982679169 Employer I.D. Number (EIN) \_\_\_\_\_Site Address 901 Marcon BlvdCounty [redacted] Municipality Hanover Twp Zip 18109Name of Inspector Walter F. Govern IIIName & Title of Responsible Official David Lauer, Environmental Health and Safety ManagerPerson Interviewed SAME Telephone ( 610 ) 596-2584Mailing Address (if different from above) SAMEAmount of Hazardous Waste Generated per Month: h2200 Pounds \_\_\_\_\_ Kgs \_\_\_\_\_

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☒ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types Batteries, Mercury Containing Equipment, and Lamps

## 3. Hazardous Waste Transporters:

Transporter Name Freehold Cartage, Inc. License Number NJD054126164Transporter Name St. Joseph Motor Lines License Number PAD987358587

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

Waste Code	Waste Description	Destination Facility
D001, U220, U154, U115, U210	UN1993, Waste Flammable Liquid, N.O.S., 3, II (Lab Pack)	Environmental Enterprises Inc. 4650 Spring Grove Ave. Cincinnati, OH 45232 OHD083377010
D001, F002, F003	RQ, UN1992, Waste Flammable Liquids, Toxic, N.O.S., 3(6.1), II, (Isopropanol, Methylene Chloride)	EQ Detroit, Inc. 1923 Frederick Street Detroit, MI 48211 MID980991566
F002, F003, D001	RQ, UN1325, Waste Flammable Solid, Organic, N.O.S., 4.1, III, (Methylene Chloride)	Heritage WTI 1250 St. George Street East Liverpool, OH 43920 OHD980613541



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## HAZARDOUS WASTE INSPECTION REPORT GENERATORS – SMALL QUANTITY GENERATORS

Site Name B. Braun Medical, Inc. ID Number PAD982679169 Date 01/20/2010

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.43	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
	X			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021



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**HAZARDOUS WASTE INSPECTION REPORT**  
**GENERATORS – SMALL QUANTITY GENERATORS**  
**FACILITY SPECIFICS**

Site Name B. Braun Medical, Inc. ID Number PAD982679169 Date 01/20/2010

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				<b>CONTAINERS (Subchapter I)</b>			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



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## Hazardous Waste Inspection Report Hazardous Waste Permit by Rule Facility

Company name B. Braun Medical, Inc.I.D. Number PAD982679169

Determination of Applicability Required? 270a.60	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input checked="" type="checkbox"/>
Documentation Available?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>
Does facility accept wastes from off-site for treatment in the PBR system?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N.D.	<input type="checkbox"/>
Does facility have an NPDES permit?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N.D.	<input type="checkbox"/>
If yes, NPDES Permit Number _____						
If no, does facility discharge to a sewage treatment system with an NPDES permit? If yes, NPDES Permit Number _____	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N.D.	<input type="checkbox"/>
If yes, does system meet all Federal, State and local pretreatment standards?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N.D.	<input type="checkbox"/>

If system does not directly discharge to a POTW or its own NPDES permitted discharge, explain here.

Sytem creates Ethylene Glycol from a process that combines Sulfuric Acid / Water and Ethylene Oxide. The Ethylene Glycol is shipped to Coastline Chemical, 30470 Energy Drive, New Church, VA 23415 were It is used to make automotive antifreeze.

Site Name B. Braun Medical, Inc. ID Number PAD982679169 Date 01/20/2010

### Hazardous Waste Inspection Report Hazardous Waste Permit by Rule Facility (WWTP)

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
X				Facility has applied for or received an EPA Hazardous Waste Identification Number	264a.1	264.11	H550
X				Active portion has 24 hour surveillance	264a.1	264.14(b)(1)	H551
X				Artificial barrier surrounds active portion	264a.1	264.14(b)(2)	H552
X				Proper signs are posted	264a.1	264.14(c)	H553
X				Inspections are conducted as per inspection plan	264a.1	264.14(b)(1)	H554
X				Inspection schedule is retained at facility	264a.1	264.15(b)(2)	H555
X				Deterioration and/or malfunctions of equipment corrected as revealed by inspections	264a.1	264.15 (c)	H556
X				Immediate remedial action taken when a hazard is imminent or already present	264a.1	264.15(c)	H557
X				Inspection log is maintained and utilized properly	264a.1	264.15 (d)	H558
X				Personnel training plan approved by DEP and implemented	264a.1	264.16 (a)	H559

## Hazardous Waste Inspection Report

### Hazardous Waste Permit by Rule Facility (WWTP)

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NUMBER
	X			Facility has NPDES permit if required	264a.1	264.16(d)(e)	H560
X				Facility is equipped with internal alarm system capable of providing immediate emergency instruction to personnel	264a.1	264.32(a)	H561
X				Facility is capable of summoning outside emergency assistance	264a.1	264.32(b)	H562
X				Facility is equipped with fire, spill and decontamination control equipment	264a.1	264.32(c)	H563
X				Facility communication and/or alarm systems, and spill and decontamination control equipment is periodically tested and maintained	264a.1	264.33	H564
X				Adequate aisle space is maintained to allow unrestricted access for personnel and emergency equipment	264a.1	264.35	H565
X				Current PPC plan, prepared and implemented in accordance with Department's guidelines. Copy available on site.	264a.1	264.51	H566
X				Designated primary emergency coordinator and is on-site or on call at all times	264a.1	264.55	H567

## INSPECTION REPORT COMMENTS

Date of Inspection 01/20/2010

Identification Number PAD982679169

Company/Facility/Site Name B. Braun Medical, Inc.

## Comments:

On January 20<sup>th</sup>, 2010, the Pennsylvania Department of Environmental Protection (Department) conducted a compliance evaluation inspection of B. Braun Medical, Inc. (Braun). Representing the Department was Walter F. Govern III (this inspector). Representing Braun was Mr. David Lauer, Environmental, Health, & Safety Manager, and Mr. Chip Marshall, Environmental, Health, & Safety Specialist.

Braun manufactures disposable plastic medical devices and is a large quantity generator of hazardous waste. This inspector toured the facility and observed points of generation and satellite accumulation areas in the manufacturing areas of the plant. The entire plant was extremely clean. Mr. Lauer stated that they Braun put great emphasis on housekeeping due to FDA regulations and requirements. Satellite accumulation areas were closed when not being added to and appropriately labeled as Hazardous Waste. No waste management violations were observed during this inspection of the points of generation.

The 90 Day Storage Area for hazardous waste was inspected by this inspector. There were three drums staged in the 90 Day Storage Area. The latest date on these drums was 12/14/2009. The drums were positioned in a manner that labels were easily read and the drums were adequately spaced to allow for movement between the drums. Secondary containment was in good shape and fire control systems were ready to be used in the event of an emergency, during the time of this inspection.

This inspector also conducted a records review during this inspection. This inspector reviewed the following records:

- PPC Plan 2009 ("Hazardous Materials Offsite Response Plan" as per SARA, Title III requirements)
- Source Reduction Strategy
- Biennial Report 2007
- 90 Day Storage Area Inspection Logs
- Drum Inspection Logs
- Personnel Training Records
- Outbound Manifests 2008 & 2009

All records were reviewed and appeared to be complete.

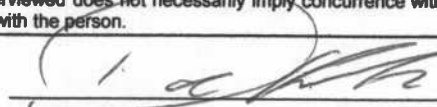
This concludes this compliance evaluation inspection as there were no waste management violations observed during the time of this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

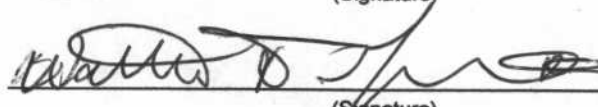
Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

  
(Signature)

Date 01/20/2010

Inspector

  
(Signature)

Date 01/20/2010

Original: PA DEP NERO WM File thru J. Leskesky  
cc: Facility (provided during the inspection)  
PA DEP BDO WM File thru W. Govern  
P. Pagoda (PA DEP CO copy)  
W. Govern  
D. Fisher